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IN THE

Supreme Court of the United States

OCTOBER TERM, 1951

No. 198

GORDON LOUK, JOSEPH J. BLONDELL,
JANE L. LOUK and ELIZABETH B. BLONDELL,
Petitioners,

VS.

HARRY D. FRIEDMAN, EDWARD N. LIGHTBOWN,
and NICHOLAS OREM, JR.,
Respondents.

PETITIONERS' REPLY BRIEF

GORDON LOUK,
JANE L. LOUK,
JOSEPH J. BLONDELL,
ELIZABETH B. BLONDELL,
In Proper Person.

The Daily Record Co., Baltimore 3, Md.

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RECAPITULATION

Civil Action No. 5154 is directed against Nicholas Orem, Jr. in his capacity as an officer of the State of Maryland. The complaint therein sets forth that the defendant Nicholas Orem, Jr., through the medium of an executed unlawful conspiracy with the other two-named defendants Edward N. Lightbown and Harry D. Friedman, under color of law, custom or usage of the State of Maryland threatened to and since has expropriated each of the named plaintiffs of

rights in property guaranteed by the Constitution of the United States, particularly Amendment Article XIV thereof. The expropriation for which relief or damages is sought by Civil Action No. 5154 is aggravated by the of-record fact that neither of the plaintiffs Jane Lenore Louk nor Elizabeth B. Blondell were parties in any State Court proceeding through which the appointment and expropriation of the officer Nicholas Orem Jr. was effected; and the further record-fact that the non-resident plaintiff Henry G. Bartsch was denied intervention in the courts of the State of Maryland to protect his rights in said property.

Petitioners respectfully submit that the United States District Court for the District of Maryland, and the United States Court of Appeals for the Fourth Circuit in partially affirming the decision of said United States District Court, erred in finding The United States District Court for the District of Maryland to be without jurisdiction under the United States Code Title 28, Section 1343 and Title 8, Sections 41, 42, 43 and 47.

Respectfully submitted,

GORDON LOUK,
JANE L. LOUK,
JOSEPH J. BLONDELL,
ELIZABETH B. BLONDELL,
In Proper Person.